

Feedback Form

Overview and Q&A Session on the Small Hydro Program (SHP) Draft Documents: September 19, 2023

Feedback Provided by:

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Date: Sept. 26, 2023

Following the September 19, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by end of day Tuesday, September 26, 2023. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

SHP Draft Documents

Topic	Feedback
What feedback do you have related to OEFC eligibility and the requirement to terminate the OEFC Contract prior to the Contract Date?	OPGC agrees with comments submitted by the Ontario Waterpower Association (OWA)
What feedback do you have related to the GRC (Gross Revenue Charge) Adjustment mechanism?	OPGC agrees with comments submitted by the OWA, and would further clarify that should the Federal Government adjust its payment mechanism (which is presently generally in line with the GRC as per the Provincial Government), that would also be covered by the GRC Adjustment mechanism in the new contract
What feedback do you have related to Upgrades & Expansions being enabled for those in the SHP that previously held HCI Contracts?	OPGC agrees with comments submitted by the OWA
What feedback do you have related to Exhibit B1 of the draft SHP-AR Contract?	OPGC agrees with comments submitted by the OWA
What feedback do you have on the draft SHP Contract?	OPGC agrees with comments submitted by the OWA
What feedback do you have related to Exhibit B2 of the draft SHP-AR Contract or Exhibit B of the draft SHP Contract?	OPGC agrees with comments submitted by the OWA. For clarity, for the first 438 hours of negative pricing each year, it is assumed that the supplier would be compensated firstly for paying the negative amounts due to the negative HOEP or market rate, and secondly at a rate of 25% of the contract price times energy produced during each negative hour. Additionally, it is assumed that any negative market priced hour that occurs while a generator is offline for maintenance would not be counted towards the first 438 hours
What feedback do you have on the draft Application Form?	OPGC agrees with comments submitted by the OWA
What feedback do you have on the draft Prescribed Forms?	No comment

Topic	Feedback
What feedback do you have related to Rules related to Secured Lender Agreements?	No comment except to keep it simple so as not to add undue time to the process.

General Comments/Feedback

OPGC agrees with OWA regarding the need to carefully define installed capacity. A historical approach based on actual output would be the most equitable solution.